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2017 OCT 20 AM 9:09

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA

LYDA ELIZABETH GREENE

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

DEFENDANTS

Attached except for

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Complaint for a Civil Case

Case No. _____
(to be filled in by the Clerk's Office)

Jury Trial: ☒ Yes ☐ No
(check one)

defendants that
they won't release
names, addresses,
places, times

Defendants

1. Grand Strand Regional Medical Center

809 82nd Parkway
Myrtle Beach, S.C. 29577
843-692-1000

2. Grand Strand Surgical Specialists
LLC

849 82nd Parkway
Myrtle Beach, S.C. 29577
843-497-6348

843-449-2336

AKA Grand Strand Surgical Care

AKA Grand Strand Spine & Neuro Center

AKA Grand Strand Specialty Assoc.

3. Tideland Waccamaw Community Hospital

4070 Hwy 17 Bypass
Murrells Inlet, S.C.

843-652-1000

AKA Waccamaw Community Hospital

AKA Beaufort Memorial Hospital

^{includes}
Waccamaw Physicians

Physical Rehab - 4th floor

defendants

4. Amedisys Home Health
of Myrtle Beach
1309 Professional Drive
Myrtle Beach
843 - 916-0931
5. Unknown: Medical Equipment
No records released to
Lyda Elizabeth Greene
6. Horry County Fire Rescue
2560 Main Street
Conway, S.C. 29526
843-915-5190
7. Horry County Government
1301 Second Avenue
Conway, S.C. 29526
843-915-5020
8. Horry County Libraries
1008 Fifth Avenue
Conway, S.C. 29526
843-915-5285

Defendants

9. Clerk of Court
 Pennsylvania Eastern Division
 (Third Circuit)
 601 Market Street,
 Philadelphia, Pennsylvania 19106

10. Dr. Christopher Boullion
 849 82nd Parkway
 Myrtle Beach, S.C. 29577
 843-449-2336

11. Traveling Nurses at
Grand Strand Regional
Medical Center.

(a) traveling Nurse who
 supposedly was "watching"
 me when in Emergency
 Room about 11:30 AM 4/12/13
 was: [I was boarded
 and collared with [coma]
 head injuries and blunt
 force injuries]

* Erik Foster Rogers, RN

attachment 1 page 5

Horry County - other companies that provide services to Horry County - past & present et al
Horry County employees - past AND PRESENT et al

GRAND STRAND Regional Medical Center et al past + PRESENT et al
GRAND STRAND Regional Medical Center
Employees, contractors, Specialists, et al, LICENSES, PAST AND PRESENT et al

GRAND STRAND Surgical Specialists et al, PAST/PRESENT
GRAND STRAND Regional Medical Center, employees
 + NON employees: TRAVELING Drs AND TRAVELING NURSES, et al
 AND THEIR COMPANY NAMES AND ADDRESSES, PAST AND PRESENT

GRAND STRAND Regional Medical Center's et al
all employees, drs, NURSES, XRAY, all

people both employees AND ALL people past AND PRESENT
on property that belongs to another company or organization that provides services at or to
ANY GRAND STRAND Regional Medical Center
patient either on site or off site, et al

ALL providers of services to patients in Emergency Rooms et al both on site and off site including
GRAND STRAND Regional Medical Center AND
ANY SPECIALISTS, NAMES AND ADDRESSES, Identity
NAMES, BADGES, LICENSES, Employees UNDER
ANOTHER COMPANY'S NAME AND ADDRESS, PAST AND PRESENT et al

ALL providers of any services to patients both in/out Patient
ANY GRAND STRAND Regional Medical Center's
facilities, past AND PRESENT
ANY AND ALL EMPLOYEES AND PRIVATE CONTRACTORS et al that
provide ANY service to inpatient/OUTPATIENT/RELEASED
PATIENT of GRAND STRAND Regional Medical Center includ
 * Go to page 2 →

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Grand Strand Spine and Neuro Center, Grand Strand Surgical Care, Grand Strand Surgical Specialists LLC et al, Grand Strand Specialty Assoc et al, both past and present.

Any Persons who saw, touched, recorded, consulted, or provided ANY Services to LYDA ELIZABETH GREENE on and with INJURIES et al on April 12, 2013 ACCIDENT THAT occurred approximately at 11:00 AM on that Friday, both past and present.

TIDELANDS Georgetown Memorial Hospital / TIDELANDS Waccamaw Community Hospital, ET AL INCLUDING, BY ANOTHER NAME, all employees, all non employees (example- contractors, employees of another company that provide services on and off site of Tideland Waccamaw Community Hospital et al by any other name. All licenses of all and Registration of both hospital, employees, non employees (employed by another company) et al past and present ANY past and present employees AND private company employees NAMES, ADDRESSES, LICENSES of GRAND STRAND REGIONAL MEDICAL, Horry County, Horry County Fire Rescue, TIDELANDS Georgetown or Waccamaw Community Hospital, ASSIGNED PATIENT CARE AND Aftercare, ANY other company providing MEDICAL EQUIPMENT, visiting medical personnel AND company with licenses, ANY Home CARE providers INCLUDING persons assigned to provide food, washing, medicine, transportation, assistance in DAILY LIVING, wound care, BATHING ASSISTANCE, telephoning, monitoring, bedside care, health, safety, AND LIABILITY CARE, cleaning home, wound care, providing NUTRICIAN CARE, washing dishes, PAVING BILLS, providing social attendance, safety care, protection care from falls, in house 24 hour service, prescriptions dispensing, and ANY other service required BY A PLUNT FORCE INJURY AND Traumatic main INJURY PATIENT LYDA ELIZABETH GREENE
Go to page 3 → (over)

page 3

ANY AND ALL Transportation companies
AND ANY Equipment for patient LYDA ELIZABETH
GREENE.

ANY Rehabilitation companies and employees
giving care to Lyda Elizabeth Greene with
any injuries resulting from April 12, 2013
accident.

Any and all discharge plans, care, records
resulting from April 12, 2013 accident.

This does not exclude any company
or individual not herein named.

Lyda Elizabeth has been denied names,
addresses, date & times, places, companies etc
in order for her to list all involved including
records.

RECEIVED
USDC CLERK, CHARLESTON, SCIN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA

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Pro Se Non-Prisoner Complaint Form

[Enter the full name of the plaintiff in this action]

Civil Action No.

LYDA ELIZABETH GREENE

(to be assigned by Clerk)

v.

[Enter the full name of each defendant in this
action. If possible, please list only one defendant
per line.]HORRY COUNTY FIRE RESCUE ETAL
GRAND STRAND HOSPITAL ETAL
TIDELANDS COMMUNITY HOSPITAL ETALRETURNED FOR
NOT A PROPER VENUEIf allowed by statute, do you wish to have a trial by jury? Yes ☒ No ☐

[If any answer requires additional space, please use additional paper and attach hereto.]

I. PREVIOUS LAWSUITS

A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action?

Yes ☒ No ☐BUT HAS BEEN RETURNED
AS WRONG JURISDICTION

B. If your answer to A is Yes, describe the lawsuit in the space below. [If more than one lawsuit, describe on another sheet of paper using the same outline.]

1. Parties to this previous lawsuit:

Plaintiff: LYDA ELIZABETH GREENE

Defendant(s): HORRY COUNTY FIRE AND RESCUE ETAL

2. Court: GRAND STRAND HOSPITAL ETAL

TIDELANDS COMMUNITY HOSPITAL

UNITED STATES DISTRICT COURT EASTERN

ETAL

DISTRICT OF PENNSYLVANIA

(If federal court, name the district; if state court, name the county)

3. Docket Number: _____

4. Name(s) of Judge(s) to whom case was assigned: _____

5. Status of Case: _____
(For example, was the case dismissed? Settled? Appealed? Still Pending?)

6. Date lawsuit was filed: _____

7. Date of disposition (if concluded): _____

C. Do you have any other lawsuit(s) pending in the federal court in South Carolina?

Yes _____ No ☒

II. PARTIES

US DISTRICT COURT
EASTERN DISTRICT OF PA

In Item A below, place your name and address in the space provided. [If additional plaintiffs, do the same on another sheet of paper.]

A. Name of Plaintiff: _____

Address: _____

In Item B below, place the full name of the defendant, and his/her/its address, in the space provided. Use Item C for additional defendants, if any.

B. Name of Defendant: _____

Address: _____

C. Additional Defendants (provide the same information for each defendant as listed in Item B above):

COURT SAID THEY
WILL SEND THIS COURT
ALL THE FILINGS FROM US DISTRICT
COURT, EASTERN DISTRICT OF PA
UPON REQUEST BY

III. STATEMENT OF CLAIM

State here, as briefly as possible, the facts of your case. Describe how each defendant is involved.

SC COURT

Job or Title
(if known)
Street Address
City and County
State and Zip Cod
Telephone Number

Defendant No. 4

Name
Job or Title
(if known)
Street Address
City and County
State and Zip Code
Telephone Number

Told by all
defendants
verbally that
employees are
no longer there,
have no idea
where they are,

some even
work out of
US in other
countries, they
have been
dispersed to
prevent lawsuit
etc.

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited p types of cases can be heard in federal court: cases involvi involving diversity of citizenship of the parties. Under 28 under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

☐ Federal question

☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this

A. If the Basis for Jurisdiction Is a Federal Que

List the specific federal statutes, federal treaties States Constitution that are at issue in this case.

SC is insuring
agent for Harry
County, so
doesn't that
mean Federal
Court in another
state?

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, (name) LYDA ELIZABETH GREENE, is a citizen of the State of (name) SOUTH CAROLINA.

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, (name) _____, is a citizen of the State of (name) _____. Or is a citizen of (foreign nation) _____.

If the defendant is a corporation

The defendant, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____. Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

Citizenship of all defendants is questionable since they won't release details - names addresses etc

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

Have you read
 ← III Statement of
 Claim?

III. Statement of Claim

Write a short and plain statement of the claim. Do not briefly as possible the facts showing that each plaintiff relief sought. State how each defendant was involved caused the plaintiff harm or violated the plaintiff's right of that involvement or conduct. If more than one claim and write a short and plain statement of each claim in additional pages if needed.

"State briefly"
 how each "defendant"
 was involved. Only
 an attorney or
 judge experienced
 in negligence/
 malpractice
 could summarize
 hundreds of pages.
 I'm not qualified.

IV. Relief

State briefly and precisely what damages or other relief order. Do not make legal arguments. Include any benefits alleged are continuing at the present time. Include the damages claimed for the acts alleged and the basis for these damages. Exemplary damages claimed, the amounts, and the actual or punitive money damages.

I'm still seriously
 injured and even
 trying to read
 hundreds of notes
 as to the suffering
 from this accident
 absolutely destroys
 me. The pain
 was and is
 ungodly.
 Ditto IV

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: _____, 20__.

Signature of Plaintiff _____

Printed Name of Plaintiff _____

B. For Attorneys

Date of signing: _____, 20__.

Signature of Attorney _____

Printed Name of Attorney _____

Bar Number _____

Name of Law Firm _____

Address _____

Telephone Number _____

E-mail Address _____

Wouldn't an attorney be assigned for a coma victim? Who was in charge?

Include also the name(s) of other persons involved, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach extra sheets of paper if necessary.

SC MOST REQUEST
ALL THIS INFORMATION
that WAS MAILED TO US
DISTRICT COURT, EASTERN DISTRICT
OF PENNSYLVANIA. ONLY ORIGINALS
EXIST AND THEY ARE AT ABOVE
COURT

III. STATEMENT OF CLAIM - *continued.*

Oct 11, 2017

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Injuries

Blunt force head injury in Horsey County Building with broken bones each hand, shattered left wrist, shattered right knee - 14 shattered teeth - 11 broken or totally gone - 3 with cracks that can't be saved. Left shoulder that was injured but not broken, now needs replacement.

Boarded and collared from Horsey County Building BFI/TBI taken to Grand Strand Hospital where I was dropped on the floor while in a coma shattering right side of face teeth. Somehow Waccamaw Tideland got involved. Have no idea of anything due to coma. Woke up in apartment - no food - no body care, no way to get up;

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no way to get to bathroom,
no way to bathe, no way
to get food, no way to
change sheets on a hospital
bed. inside the apt door
were from hospital bed
inserted on leg, and more.

Being in a coma is a
blessing with severe injuries.
It's only much later as
you, up to know — no hearing,
no sight, no awareness —
start to briefly start to "awaken",
are you aware you are in
extreme pain. At first
you, still blind & still hearing,
have some slight awareness you
are screaming in pain but
you still can't see and you
can't hear your screams.
Slowly your awareness get
more focused and you continue
screaming but nobody comes.
Even the sheet touching your
face makes you scream from
pain. As you are slightly

3 of 4

aware longer and then longer, the pain is so bad you try to go back unconscious / or "asleep" and you cant. Nobody comes.

The records are incomplete or completely disappeared. They don't know where these "unknown" employees are or even where they live. Some are not in SC and not even in US.

Death Manager at GSH told me over phone the detailed records are their personal records and I could get an attorney to force them to release them if they could even be found.

The head injuries aren't being addressed as Modicare doesn't do any facial/malocclusion surgery. I imagine the

484

constant ongoing head
will turn to bypass system
shock and then it won't
matter.

Lyda L. Green

5600 Enterprise
Road. 6D

Myrtle Beach, SC
29588

A43 - 331-9263

IV. RELIEF.

State briefly and exactly what you want this court to do for you.

SC has to request from
US DISTRICT COURT, EASTERN
DISTRICT OF PENNSYLVANIA
ONLY ORIGINALS - NO COPIES

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 11 day of October, 2017


Signature of Plaintiff